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7 Attorneys for Plaintiff
8 SHOWTIME NETWORKS INC.

9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 SHOWTIME NETWORKS INC.,

CASE NO. 2:17-CV-6041

14 Plaintiff,

15 v.

16 JOHN DOE 1 d/b/a Kopa Mayweather
d/b/a <Livestreamhdq.com>;
17 <mayweathervsmcgregor.livestreamhdq.c
om>;
18 <mayweathermcgregor.livestreamhdq.co
m>;
19 <mcgregorvsmayweather.livestreamhdq.c
om>; and JOHN DOE 2 d/b/a Mickel
20 Edwards d/b/a
<Floydmayweatherconormcgregor.us>;
21 <Floydmayweathervsconormcgregorfight.
us>;<Floydmayweathervsmcgregor.us>;<
22 Mayweathermcgregorfight.us>;<Mayweat
hermcgregorlivefight.us>;<Mayweathervs
23 conorlive.us>;<Mayweathervsconormcgre
gorlive.us><Mayweathervsmcgregor.us>;
24 <Mayweathervsmcgregor2017live.us>;<
25 Mayweathervsmcgregorboxing.us>;<May
26 weathervsmcgregorbuytickets.us>;<May
27 weathervsmcgregorbuytickets.us>;<May
28 weathervsmcgregorbuytickets.us>;<May

**EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING
ORDER AND ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT
ISSUE**

1 weathervs-
2 mcgregorlive.us>;<Mayweather-vs-
3 mcgregorlive.us>;<Mayweather-vs-
4 mcgregor-live.us>;
5 <Mayweathervs mcgregor liveboxing.us>;
6 <Mayweathervs mcgregor live-
7 boxing.us>;<Mayweathervs mcgregor live-
8 online.us>;<Mayweathervs mcgregor live-
9 ppv.us>;<Mayweathervs mcgregor live-
10 stream.us>;<Mayweathervs-
11 mcgregor live stream.us>;<Mayweathervs-
12 mcgregor live stream.us>; <Mayweather-
13 vs mcgregor live stream.us>;
14 <Mayweathervs-
15 mcgregor live streaming.us>;<Mayweather-
16 -vs mcgregor live streaming.us>;
17 <Mayweathervs mcgregor ppv buys.us>;
18 <Mayweathervs rmcgregor ppv fight.us>;
19 <Mcgregor vs floyd mayweather.us>;
20 <Mcgregor vs mayweather ppv fight.us>;
21 <Watchconormcgregor fight online.us>;
22 <Watchmayweather vs mcgregor live.us>;
23 <Watchmayweather vs mcgregor live stream-
24 .us>;<Watchmayweather vs rmcgregor live fi-
25 ght.us>;<Watchmayweather vs rmcgregor pp-
26 pv fight.us>;<Watchmcgregor vs mayweather-
27 er.us>;<Watchmcgregor vs mayweather liv-
28 e.us>;
29 <Watchmcgregor vs mayweather live stream-
30 .us>; <mayweather vs mcgregor.us>;
31 <mayweather vs mcgregor live online.us>;
32 <mayweather vs mcgregor live ppv.us>;
33 <mayweather vs mcgregor live stream.us>;
34 and <mayweather vs mcgregor ppv buys.us>;
35 and JOHN DOES 3-10 inclusive,

26 Defendants.
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1 Pursuant to Federal Rule of Civil Procedure 65 and Local Rules 7-19 and 65-
 2, Plaintiff Showtime Networks Inc. (“Plaintiff”) hereby applies *ex parte* for: a
 3 temporary restraining order; and an order to show cause why a preliminary
 4 injunction should not issue.

5 By this application, Plaintiff respectfully requests immediate relief to prevent
 6 Defendants John Doe 1 d/b/a Kopa Mayweather d/b/a <livestreamhdq.com>,
 7 <mayweathervsmcgregor.livestreamhdq.com>, <mayweathermcgregor.livestreamhdq.com>, and <mcgregorvsmayweather.livestreamhdq.com> (the
 9 “LiveStreamHDQ Websites”); John Doe 2 d/b/a Mickel Edwards d/b/a
 10 <Floydmayweatherconormcgregor.us>, <Floydmayweathervsconormcgregorfight.us>,
 11 <Mayweathermcgregorfight.us>, <Mayweathermcgregorlivefight.us>,
 12 <Mayweathervsconorlive.us>, <Mayweathervsconormcgregorlive.us>,
 13 <Mayweathervsconormcgregor2017live.us>, <Mayweathervsmcgregorboxing.us>,
 14 <Mayweathervsmcgregorbuytickets.us>, <Mayweathervs-mcgregorlive.us>,
 15 <Mayweather-vs-mcgregorlive.us>, <Mayweather-vs-mcgregor-live.us>,
 16 <Mayweathervsmcgregorliveboxing.us>, <Mayweathervsmcgregorlive-boxing.us>,
 17 <Mayweathervsmcgregorlive-fight.us>, <Mayweathervsmcgregorlive-online.us>,
 18 <Mayweathervsmcgregorlive-ppv.us>, <Mayweathervsmcgregor-live-stream.us>,
 19 <Mayweathervs-mcgregorlivestream.us>, <Mayweathervs-mcgregorlive-stream.us>,
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 22 <Mayweathervsmcgregorppvbuys.us>, <Mayweathervsrmcgregorppvfight.us>,
 23 <Mcgregorvsfloydmayweather.us>, <Mcgregorvsmayweatherppvfight.us>,
 24 <Watchconormcgregorfightonline.us>, <Watchmayweathervsmcgregorlive.us>,
 25 <Watchmayweathervsmcgregorlivestream.us>, <Watchmayweathevsrmcgregorlivefight.us>,
 26 <Watchmayweathevsrmcgregorppvfight.us>, <Watchmcgregorvsmayweather.us>, <Watchmcgregorvsmayweatherlive.us>, <Watchmcgregorv

1 smayweatherlivestream.us>, <mayweathervs-mcgregor.us>, <mayweathervs
2 mcgregorliveonline.us>, <mayweathervs mcgregorliveppv.us>, <mayweathervs
3 mcgregorlivestream.us>, and <mayweathervmcgregorppvbuys.us> (the “.US
4 Affiliate Websites”); and John Does 3 through 10, inclusive (collectively,
5 “Defendants”) from infringing Plaintiff’s invaluable intellectual property rights by
6 offering and distributing over the Internet a live stream of the coverage of the widely
7 anticipated championship boxing match between Floyd Mayweather, Jr. and Conor
8 McGregor, which will occur on Saturday, August 26, 2017 along with three
9 undercard bouts (the “Fight”). In the United States, the transmission and/or
10 performance of the Fight will be available as a pay-per-view event beginning at
11 approximately 9:00 p.m. Eastern Time on August 26, 2017, and continuing until the
12 Fight’s conclusion. The transmission and/or performance is referred to as the
13 “Coverage.”

14 Plaintiff requests that the Court enter a temporary restraining order that
15 includes the following material terms as set forth in additional detail in the proposed
16 order submitted herewith:

- 17 1. Each and every one of the Defendants and their agents, servants,
18 employees, officers, attorneys, successors, licensees, partners, and assigns and all
19 other persons who receive actual notice of this Order and who are in active concert or
20 participation with any of them, are temporarily restrained and enjoined from:
 - 21 a. making the Fight available for viewing by others by knowingly hosting,
22 distributing, reproducing, performing, selling, offering for sale, making
23 available for download, streaming or making any other use of the
24 Coverage or any portion thereof;
 - 25 b. taking any action that induces, causes or materially contributes to the
26 direct infringement of Plaintiff’s rights in the Coverage by any third
27 party, including without limitation knowingly hosting, distributing,
28 reproducing, performing, selling, offering for sale, making available for

1 download, streaming or making any other use of the Coverage or any
2 portion thereof;

3 c. otherwise infringing Plaintiff's copyright in the Coverage in any manner,
4 whether directly, contributorily, vicariously or in any other way; and
5 d. transferring or performing any function that results in the transfer of the
6 registration of the LiveStreamHDQ Websites or .US Affiliate Websites
7 to any other registrant or registrar.

8 2. Defendants and each of them, including without limitation their agents,
9 servants, employees, officers, attorneys, successors, licensees, partners, and assigns
10 and all those acting in active concert or participation with any of them be temporarily
11 restrained and enjoined from effecting assignments or transfers, forming new entities
12 or associations or utilizing any other device for the purpose of circumventing or
13 otherwise avoiding the Court's order.

14 Plaintiff further requests that the Court require no bond to be posted prior to
15 entry of the restraining order.

16 Plaintiff further requests that the Court enter an order to show cause why a
17 preliminary injunction should not enter and set an expedited briefing and hearing
18 schedule so that the motion may be heard at the earliest possible time.

19 Plaintiff has not yet been able to verify Defendants' true names and locations.
20 To Plaintiff's knowledge none of Defendants are represented by counsel. Plaintiff
21 gave Defendants notice of this application by electronic mail on August 15, 2017, as
22 set forth in the Declaration of Caroline Y. Barbee submitted herewith. As of this
23 filing Plaintiff has received no response from Defendants.

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1 DATED: August 15, 2017 Respectfully submitted,
2 KILPATRICK TOWNSEND & STOCKTON
3 LLP

4 By: /s/ Dennis L. Wilson
5 DENNIS L. WILSON

6 Attorney for Plaintiff
7 SHOWTIME NETWORKS INC.

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